

- SBF as input the a TMK hierarchy, and
- TMK as the behavior of SBF models. As described above, this symmetry is not taught nor anticipated by Goel.

These four claimed aspects are novel, useful, and described in the specification.

It is abundantly clear that Goel does not teach software that is adapted to or capable of performing the aforementioned functions or steps. None of the cited references including Goel suggest the use of a TMK hierarchy and encoding the input parameter and the output parameter using a structure-behavior-function model, which is collected from the user. This limitation was previously incorporated into claim 3 (now cancelled).

Goel definitely does not teach using TMK hierarchies as the SBF behaviors. The use of SBF as the input parameters to TMK, and using TMK as the processing portion of SBF is completely new to the applicant's specification, novel and not taught, suggested or motivated in the least bit by Goel.

For the above reasons, the case is considered in condition for Allowance and the same is respectfully urged.

Regards,



Michael Molins
Reg. No. 31785
Customer No. 33372

Encl.

MM/rm